

EXHIBIT 2

27533CroteauSandra051308

1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 DELORES A. ARREGUIN, for
4 herself and other members
of the general public
similarly situated,

Case No. C 07 6026

5 Plaintiff,

6 vs.

7 GLOBAL EQUITY LENDING,
8 INC., a Georgia
Corporation, and DOES 1
through 10, Inclusive,

9 Defendants.

10 ~~~~~

11 DEPOSITION OF
12 SANDRA CROTEAU

13 May 13, 2008
1:55 p.m.

14 Suite 200
15 2475 Northwinds Parkway
Alpharetta, Georgia

16 Valerie N. Almand, RPR, CRR, CCR-B-531

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1 APPEARANCES OF COUNSEL

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3 videoconference):

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1 Deposition of Sandra Croteau

2 May 13, 2008

3 SANDRA CROTEAU,

4 having been duly sworn, testified as

5 follows:

6 EXAMINATION

7 BY-MR.AIN:

8 Q. Hello. Can you state your name for
9 the record, please?

10 A. Sandra Croteau.

11 Q. How are you doing, Sandra?

12 A. Fine.

13 Q. My name is Farris Ain. I am the
14 attorney for the plaintiff, Dolores Arreguin,
15 in this lawsuit against what we will refer to
16 as GEL, Global Equity Lending.

17 Can you please tell me your current
18 employment?

19 A. By employment you mean title with
20 the company?

21 Q. Starting with whether you work for
22 the company, yes.

23 A. Yes. I'm the vice-president of
24 administration for Global Equity Lending.

25 Q. And how long have you been in this

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1 position?

2 A. Five years.

3 Q. And what was your position before?

4 I assume you were still with the company.

5 A. I actually worked for the former
6 company prior to the five years.

7 Q. And what company was that?

8 A. World Marketing Alliance.

9 Q. Are you familiar with a company by
10 the name of world Lending Group?

11 A. Yes.

12 Q. Is that different from world
13 Marketing Alliance?

14 A. Yes, it is. World Lending Group is
15 the former name of Global Equity Lending.

16 Q. Okay. What was the relationship
17 with world Marketing Alliance and world
18 Lending Group?

19 A. There's no relationship.

20 MR. GENTILE: Objection.

21 Q. There's no relation, okay. Did you
22 ever work for world Lending Group?

23 A. Yes.

24 Q. When was that?

25 A. That was formerly Global Equity

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1 Lending. I started with them January 2003.

2 Q. Just to make sure that I heard you
3 correctly, before World Marketing Alliance
4 you worked for World Lending Group; correct?

5 A. No, that's not correct. I think I
6 confused the issue, I apologize.

7 World Marketing Alliance was a
8 former company that I worked for. I was able
9 to retain my hire date and everything when I
10 moved over to World Lending Group, which is
11 now Global Equity Lending.

12 Q. Okay. I got you. So you started
13 with world Lending Group in January of 2003.

14 A. That's correct.

15 Q. Okay. Do you know when world
16 Lending Group changed to Global Equity
17 Lending?

18 A. I believe it was sometime in 2003, I
19 don't know the exact date.

20 Q. Okay. Would November of 2003 be
21 fairly accurate, right around that time?

22 A. Yes, I believe it was, yes.

23 Q. Okay. Sandra, the purpose of this
24 deposition, I'm going to give you a little
25 bit of background about what we're doing here

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1 today. Have you had your deposition taken
2 before?

3 A. No.

4 Q. This is your first time, okay. A
5 deposition is, as you see here, is a question
6 and answer session that is under oath, as if
7 we would be in court, where you're to give us
8 your best answers to the best of your
9 ability, you know, as truthful as you can
10 recall.

11 At the end of this deposition there
12 will be a transcript that the court reporter
13 in front of you is taking down everything
14 that's being said by myself, the other two
15 attorneys and you, and you'll have an
16 opportunity to review it and make any
17 corrections or if you recall a different, you
18 know, answer later on, you'll have an
19 opportunity at the end to review this and
20 sign it under oath, and you'll provide it to
21 us, to the attorneys.

22 Although you'll be able to make
23 changes, if the changes are substantive and,
24 you know, they change what you've said
25 significantly, we could make comments about

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2 credibility or the accuracy of your
3 testimony.

4 The way things are going to go
5 today, I'm going to ask questions, I'm going
6 to wait for you to respond, because the court
7 reporter could only take down one person's
8 comments and, you know, talking at a time.

9 And, of course, give the attorneys
10 an opportunity to object, maybe wait a second
11 in case they want to insert an objection. We
12 have to do that for the record to preserve
13 our objections and, you know, that's
14 understood.

15 But unless your attorneys instruct
16 you not to answer a question, for example if
17 I ask you what did you talk about with your
18 attorney, that's none of my business. That's
19 protected under your attorney/client
20 privilege, and they will instruct you not to
21 answer.

22 And I may veer off into other issues
23 that they don't feel comfortable with me
24 asking and, you know, they'll insert their
25 objection at that time.

8

1 The purpose of this depo today, this

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2 deposition, is limited to a specific issue
3 that we're in front of the court on right
4 now, and that is the arbitration clause in
5 the contracts that we'll go over and whether
6 this lawsuit belongs here in California or
7 whether it should be moved to Georgia, and
8 that's the venue clause in these contracts.

9 And specifically what I'm here to
10 ask of you is to ask you some questions about
11 what you recall about how the procedures went
12 about with Global Equity Lending and with
13 world Global -- hold on, it's going to be a
14 little bit, you know, with me screwing up the
15 names here, but I'll get them down by the end
16 of the day -- World Leadership Group and all
17 of the other entities, just so that we
18 understand how these things -- these
19 documents come about and how somebody like
20 Delores would have reviewed them, signed them
21 and whether, you know, they understood them
22 or not.

23 And, of course, there's going to be
24 some questions I'm going to ask you that
25 you're not going to know the answer to, and

1 it's completely fine for you to respond --
2 it's completely fine for you to respond that

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3 you don't know the answer or you don't
4 recall.

5 I don't expect you to have the
6 answers to everything. It's been well over
7 five years since most of this occurred.
8 However, when I ask a question that you may
9 have some knowledge or some facts about I'm
10 entitled to your best answer, and you can
11 give me an estimate but you can't guess. I
12 don't want you to guess or speculate about
13 anything.

14 For example, if I want to ask you
15 how long that table is in front of you, you
16 may not have a ruler but you can estimate and
17 based on your knowledge say hey, this thing
18 looks about eight feet wide to four feet
19 wide. But if I was to ask you how long is
20 this table in here which you can't see, I'd
21 want you to speculate that most law firms
22 have a standard sized table and it must be
23 ten feet. Don't speculate; okay?

24 A. Okay.

25 Q. Let's see what else do we need to go

10

1 over? I think that ought to be it for now.

2 Are you under any medication or did

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3 you drink any alcohol or any substance that
4 would effect your ability to testify
5 truthfully today?

6 A. No.

7 Q. Okay. And then other than that, I
8 just need to ask this one nosy question.
9 Have you been convicted of any felonies?

10 A. No.

11 Q. Okay.

12 MR. AIN: I'm going to wait until
13 you guys get the documents. When they
14 get here let me know that and I'll
15 switch to that.

16 MR. MCLEAN: They're here.

17 MR. AIN: They're there? Okay. Let
18 me go ahead and start, then.

19 Q. (By Mr. Ain) Sandra, when you
20 worked for World Lending Group what was your
21 position?

22 A. Vice-president of administration.

23 Q. So you've been in the same position,
24 it's just that the company name has changed;
25 is that correct?

11

1 A. Yes, that's correct.

2 Q. Okay. Before January of 2003 when
3 you worked for World Lending Group who did

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4 you work for before that?

5 A. World Marketing Alliance. Well,
6 sorry. Right before that I worked for World
7 Financial Group.

8 Q. Okay. And that was the company that
9 the plaintiff was working for as well;
10 correct? You worked there with Ms. Arreguin?

11 A. World Marketing Alliance was the
12 former company, yes. World Financial Group
13 was the new -- was a different company
14 altogether.

15 Q. Okay. So you worked there with
16 Dolores at that company?

17 A. Yes.

18 Q. Okay. When you switched over to
19 World Lending -- well, hold on one minute.

20 When you switched over to World
21 Lending Group in January 2003 did you have to
22 go through any application and job interview
23 process?

24 A. Yes, I did. I filled out the --

25 Q. Can you describe -- go ahead.

12

1 A. I filled out the employment
2 paperwork that we had at the time.

3 Q. And would that be something you got

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4 off the Internet or was it a stack of

5 documents that was produced to you by mail?

6 A. No. As a home office employee it
7 would be just regular paper documents that I
8 actually came in my first day of hire and
9 completed.

10 Q. And that was in January. Do you
11 remember the exact date?

12 A. I don't. It was towards the end of
13 January, but I don't remember exactly what
14 day it was.

15 Q. Okay. And in your position as
16 vice-president of administration what were
17 your job duties?

18 A. I would oversee the home office HR
19 department. I'm also the liaison between our
20 technical support people in different
21 departments.

22 Q. In your position with HR were you
23 involved in the production of job
24 applications and loan originator contracts?

25 MR. GENTILE: I'll object as vague

13

1 and ambiguous, the term "production."

2 MR. MCLEAN: I would join in that
3 objection.

4 Q. You can still answer. Go ahead, if
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5 you understood my question.

6 MR. MCLEAN: Do you understand his
7 question?

8 THE WITNESS: I'm not quite sure I
9 do understand the question.

10 MR. MCLEAN: Then say you don't
11 understand.

12 THE WITNESS: I don't understand the
13 question.

14 Q. (By Mr. Ain) That's perfectly fine.
15 Let me ask you -- I'll strike that question,
16 let me ask you a different one.

17 In HR what were your job duties in
18 human resources exactly? what did you do on
19 like a day-to-day basis?

20 MR. MCLEAN: Just one clarification,
21 with which company? Are you referring
22 to world Lending Group?

23 MR. AIN: I believe right now, world
24 Lending Group, January 2003.

25 MR. MCLEAN: Okay.

14

1 A. well, we had home office -- there's
2 a dual role here. we had home office
3 employees and what we call our field w-2
4 employees. I handled all the HR stuff for

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5 our home office from hiring to firing,
6 benefits.

7 For the field employees I was
8 strictly just as a consultant, is this the
9 right HR form I should use, as far as
10 department of labor forms and things.

11 Q. Okay. When you refer to home office
12 employees can you give me an example of what
13 a position would be for home office
14 employees?

15 A. Like a general ledger accountant,
16 you know, our accounting department.

17 Q. Okay.

18 A. Not loan originators.

19 Q. So it's different -- okay.

20 Now, the field employees that you
21 referred to them as the w-2 employees, they
22 would call you or contact you to consult
23 about certain forms they need to fill out, or
24 what exactly they need to consult with you
25 about?

15

1 A. No. It was not the loan originators
2 that consulted with us, it was our operations
3 department who handled collecting of their
4 paperwork. They would ask me questions.

5 Q. Okay. At what point did World
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6 Leadership Group get involved with the
7 company?

8 MR. GENTILE: Object, vague and
9 ambiguous.

10 MR. MCLEAN: Do you understand the
11 question?

12 THE WITNESS: I'm not really sure.
13 I don't really --

14 Q. Okay. That's okay. Do you know who
15 World Leadership Group is?

16 A. Yes, yes.

17 Q. Who are they?

18 A. It's an entity, it's a marketing
19 company.

20 Q. Okay. And what is their
21 relationship to your employer at the time,
22 World Lending Group, if you know?

23 A. I believe it's common ownership.

24 Q. Okay. What is the purpose of World
25 Leadership Group? What were they set up to

16

1 do, exactly?

2 A. They're a marketing company.

3 Q. If you know.

4 A. They're a marketing company. They
5 would market materials out to our field

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6 force.

7 Q. what kind of material would that be?

8 Can you give me some examples?

9 A. I'm trying to think. Recruiting
10 materials in order to recruit agents to our
11 company.

12 Q. So they would provide documents to
13 help loan originators find other loan
14 originators, basically?

15 A. Yeah. I mean, there was more than
16 that, I'm sure. But yeah, that was part of
17 it. You know, they helped them recruit
18 agents.

19 Q. what else did they do?

20 A. They handled all the conventions
21 that, you know, we put on for our agents.
22 They organize it. They do all the graphics
23 for the materials, our websites.

24 Q. Do you know who the president is of
25 world Leadership Group?

17

1 A. I'd have to say I'm not sure, to be
2 honest.

3 Q. Okay. Do you know any of its
4 officers such as the CEO or the CFO?

5 A. The CFO I believe is Robert Dollar.

6 Q. Now, is world Leadership Group a
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7 subsidiary of world Lending Group?

8 MR. GENTILE: I'm going to object.

9 This calls for a legal conclusion.

10 She's a layperson.

11 Q. Sandra, do you know if world

12 Leadership Group is owned by world Lending

13 Group, or any percentage thereof?

14 A. I don't know the answer to that.

15 Q. Okay. Do you recall when Dolores

16 Arreguin, the plaintiff in this lawsuit,

17 applied for a job with world Lending Group?

18 A. I was not there at the time, no.

19 Q. Where were you -- were you still

20 with the previous company that you were

21 working for?

22 A. That is correct, yes.

23 Q. And that would be world Financial

24 Group?

25 A. Yes.

18

1 Q. Or the world Marketing? Which one?

2 A. world Financial Group.

3 Q. Okay. When did you switch over from

4 world Financial Group? And I may have asked

5 you that. Would that have been January 2003?

6 A. Yes.

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7 Q. And that's when you went over to
8 world Lending Group.

9 A. Yes.

10 Q. So when was it you worked for world
11 Marketing Alliance?

12 A. Back -- I started with them in '98
13 and worked through till 2001 with them.

14 Q. Okay. And from there you went to
15 world Financial Group; correct?

16 A. That is correct, yes.

17 Q. Okay. Are you familiar with the
18 website that World Leadership Group has set
19 up for the purpose of recruiting loan
20 originators?

21 MR. GENTILE: I'm going to object,
22 assumes facts not in evidence. It's
23 also vague and ambiguous.

24 Q. You can answer, if you can, Sandra.

25 MR. MCLEAN: Do you understand his

19

1 question?

2 MR. GENTILE: And I'll just caution
3 the witness to make sure that she
4 understands the question.

5 A. I think there's some twisting of
6 terms, so I'm not sure that I can answer that
7 question correctly.

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8 Q. Okay, that's fine. I'll strike the
9 question, let me ask a different one here.

10 When you went through the
11 application process to work for World Lending
12 Group in January 2003 was your job
13 application process different than a loan
14 originator?

15 A. Yes, it was. It was --

16 Q. Okay.

17 A. I'll explain that to you. The home
18 office was strictly paper. We don't sign an
19 agreement because we're not loan originators.

20 Q. Okay. What was your job application
21 process like?

22 A. Honestly, I don't remember all the
23 documents. I can tell you there was an I-9 I
24 had to fill out, a W-4, an application, a
25 standard type application. I'm sure there

20

1 was some type of communication things that I
2 had to, you know, acknowledge, but I don't
3 really know all the names of the forms and
4 stuff.

5 Q. Okay. Are you familiar with the
6 mortgage loan originator employment agreement
7 that was signed by Ms. Arreguin? Have you

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8 seen that before?

9 A. Yes, I have.

10 MR. GENTILE: I'm going -- excuse
11 me. I want to object here, in that it
12 is vague and ambiguous. There are
13 several agreements that have been signed
14 by Ms. Arreguin, and maybe we could be a
15 little bit more specific.

16 MR. AIN: You're right, Counsel, I
17 apologize.

18 Q. Sandra, let me have you take a look
19 at what is Bates stamped as GL 021 through
20 025.

21 A. I have it in front of me.

22 Q. Okay. Take a minute to --

23 MR. GENTILE: Okay. Just for the
24 record, let's just make sure we have the
25 document, the proper document. This is

21

1 the World Lending Group, Inc. Mortgage
2 Loan Originator Employment Agreement;
3 correct?

4 THE WITNESS: Yes, that's correct.

5 MR. GENTILE: Okay.

6 Q. (By Mr. Ain) Now, Sandra, you've
7 seen this document before; correct?

8 A. Yes, I have.

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9 Q. Okay. How would a loan original --
10 a loan originator potential employee receive
11 this document?

12 MR. GENTILE: I'm going to object as
13 vague and ambiguous, and also calls for
14 speculation. Are we talking generally
15 speaking?

16 MR. AIN: I'll be more specific.

17 MR. MCLEAN: Go ahead, I'm sorry.

18 MR. AIN: I'll be more specific.

19 Q. (By Mr. Ain) In the application
20 process when a loan originator has to apply
21 for a job, what procedures do they have to go
22 through with World Lending Group?

23 MR. GENTILE: And I'll also object
24 as vague and ambiguous as to time. What
25 time period are we talking about,

22

1 Mr. Ain? I think those are valid issues
2 there.

3 MR. AIN: I understand.

4 Q. Let's talk about on or about April
5 of 2002 until August of 2002 when the
6 plaintiff applied for a job.

7 A. I really can't answer that exactly
8 because I was not here during that time.

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9 Q. Okay. what about in January of '03
10 and on? Was this something -- are you
11 familiar with the application process during
12 that time period?

13 A. Yes, I am.

14 Q. Can you describe it for me, please?

15 A. We have an on-line system to sign up
16 for world Lending Group, there's an
17 application, I don't remember, there's a list
18 of questions that they have to ask. Once
19 they pass that they go into signing off on
20 the agreement.

21 Now, we have -- in 2003 I don't
22 remember all the documents that were in
23 there. We have improved, which means we
24 added more documents as of today to our
25 sign-up, so I don't remember exactly what

23

1 documents were there in 2003 as opposed to
2 what's there today.

3 But what they didn't sign up on line
4 they would send in and have a wet signature,
5 like the w-4 and the I-9 are documents that
6 they would have to send in to us. And they
7 would sign a background consent form, sorry.

8 Q. Okay. So let's call this the
9 application packet, whatever documents were

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10 included in it at the time, we'll go ahead
11 and, you know, set that aside for now. But
12 for the most part all these documents they
13 would receive from the website that they sign
14 up on?

15 A. Yes.

16 Q. Now, who set up this website? Is it
17 world Leadership Group or world Lending
18 Group?

19 A. I don't really know, to be honest
20 with you, since it was in place at the time.
21 I don't know where it originated.

22 Q. Okay. So this document that's Bate
23 stamped GEL 021 through GEL 025, to the best
24 of your knowledge was that something that
25 would have been produced via the website?

24

1 MR. GENTILE: I'll object as vague
2 and ambiguous using the term produced.

3 Q. If you understand my question go
4 ahead and answer. If not, I could clarify.

5 MR. MCLEAN: And, Sandy, if you
6 don't understand a question you need to
7 speak up and say you don't understand.

8 A. Right. And I was going to say I
9 don't know what you mean by produced.

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10 Q. How would a loan originator get this
11 document? Is it one of the documents that's
12 produced in the packet over the Internet or
13 is this something that's mailed to them?

14 MR. MCLEAN: Let me object at this
15 point. The document that's been
16 referred to is one that preceded -- I
17 believe it was generated at the time
18 before Sandy Croteau has testified she
19 came on with the company and precedes
20 her knowledge.

21 MR. AIN: Okay, that's fair. I
22 understand that.

23 Q. (By Mr. Ain) Sandy, is there a
24 document similar or another loan originator
25 employment agreement that existed in January

25

1 of 2003 on?

2 MR. GENTILE: Again, I'll object as
3 vague and ambiguous.

4 Q. You can answer if you can.

5 A. No, I'm not quite sure -- how you're
6 asking that is confusing to me.

7 Q. Okay. In January of '03 on, would
8 there have been an employment agreement from
9 world Lending Group that's referred -- you
10 know, that would be called a mortgage loan

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11 originator employment agreement?

12 A. Yes, but I think I need to clarify a
13 little bit. It's the same agreement. It
14 might have had a little bit of updates done
15 to it. But it would be like the same type of
16 agreement -- the same agreement that we have
17 here with updates, and that would have been
18 fully electronic in 2003. We did not mail
19 those out.

20 Now, the agent did have the ability
21 to print it off and keep a copy of it. We
22 just didn't, you know, send it out to them
23 where they signed it and send it back.

24 Q. Okay. Now, in this process when
25 this document is sent electronically do you

26

1 know whether the potential employee has an
2 opportunity to decline to accept this
3 agreement?

4 A. Well, it's not sent anyplace. They
5 actually go on to our website and they can
6 exit. They do not have to sign this
7 agreement. It is part of the hiring packet,
8 which means they could not go any further.

9 Q. Okay. It is my understanding that
10 from January 2003 on when somebody wants to

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11 log into the system they have to insert a
12 password; correct?

13 MR. GENTILE: I'll object. Assumes
14 facts not in evidence.

15 I'm not trying to be difficult,
16 Farris, I just want to put that
17 objection on the record.

18 MR. AIN: Okay.

19 Q. (By Mr. Ain) Sandra, again, unless
20 you're instructed not to answer, go ahead and
21 answer after the objection. If you don't
22 understand the question please tell me.

23 A. I think the question is wrong. I
24 mean, you said since 2003, and I have to say
25 that that's not correct, to my knowledge. We

27

1 do have a user ID and password, but they
2 would have had it, I believe, back when they
3 originally started as well. I can't, you
4 know, confirm that, but I'm sure that they
5 did. I wouldn't say it just started when I
6 went there.

7 Q. Fair enough. I just -- that's why I
8 limited it to January of '03, because I know
9 that was before your time and --

10 A. Got you.

11 Q. -- I don't want to -- okay. But
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12 when you log into the system from January '03
13 and on or to the extent that you know prior
14 to January of '03, when you enter into the
15 system you have to log in on the website;
16 correct?

17 A. Yes, that is correct.

18 Q. Okay. From time to time is it
19 accurate that certain documents are provided
20 on the website to the loan originators to
21 review?

22 A. I think I'd have to ask you to be
23 more specific. I mean, we have lots of
24 documents, and so I'm not sure what documents
25 you would be referring to.

28

1 Q. well, what do you mean by lots of
2 documents? Can you give me some examples and
3 I could focus on the ones I'm concerned with?

4 A. well, like I told you, we have the
5 World Lending Group agreement that's on the
6 website that they can view at any time. We
7 have our policy employee manual that's out
8 there.

9 Q. Okay. Is there ever any updates to
10 the loan originator agreements that's posted
11 on these websites when someone logs in?

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12 A. Yes, and I'd like to explain that a
13 little.

14 When we have significant changes to
15 the agreement we do post that particular
16 change, but we do what we call a yearly
17 signing of the agreement again, so they would
18 see any updates at that time.

19 Q. Okay. And how is it that they
20 are -- how is it that they review or
21 acknowledge these updates? Are you aware of
22 the facts regarding that?

23 MR. GENTILE: I'm going to object.
24 It calls for speculation, hopelessly
25 vague and ambiguous.

29

1 when you say they, you're talking
2 very generally to any representative of
3 the company, and it's a fairly large
4 class of people.

5 MR. AIN: That's fair.

6 Q. (By Mr. Ain) Sandra, have you ever
7 seen someone -- well, let's be specific. A
8 loan originator, have you ever helped one of
9 them log into the system?

10 A. I have not, no.

11 Q. Okay. Are you familiar with the
12 log-in procedure?

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13 A. Yes, I am.

14 Q. Can you just give me a brief
15 description of that?

16 A. You have to have -- well, first of
17 all, you're issued an agent ID, which is
18 unique to you. You enter that in as your
19 user ID, and then you enter a password and
20 that gets you into the site.

21 Q. And what can you do on this website
22 exactly?

23 A. I'm thinking.

24 Q. Take your time.

25 A. You can enter your loans through the

30

1 Global Equity Lending site. You know, that's
2 how we submit our loans, our mortgage loans.

3 Q. What else?

4 A. You also would renew, for your
5 annual renewal compliance, you would go
6 through a questionnaire. You would
7 acknowledge the questions, yes or no.

8 Any important notice that we would
9 have we would put out there on the website
10 for you to acknowledge, and again it is
11 electronic so we would capture the signature
12 and the date of that acknowledgment.

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13 Q. Okay. What are some of these
14 important notices that would be provided?
15 A. For instance, we have a fraud policy
16 that we want to make everyone aware of, and
17 they do have to acknowledge the fraud policy.
18 Q. How would they acknowledge it?
19 A. Electronically, they would read the
20 information, check off a box that says I
21 accept it, and type in their name and submit
22 it, and we capture that in the back end.
23 Q. Now, at what point -- is there like
24 an area in the website where you have these
25 notices or do they automatically pop up when

31

1 you log in?
2 A. They automatically pop up when you
3 log in.
4 Q. Okay.
5 A. If you have not signed in.
6 Q. I assume -- if I'm wrong correct
7 me -- but I assume, say I log in. At that
8 point a window pops up and says please review
9 and accept, for example, our fraud policy.
10 Is that accurate?
11 A. Yes.
12 Q. Okay. And then would you be able to
13 ignore an important notice like a fraud

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14 policy and continue about your business,
15 whether it's to upload or download mortgage
16 documents?

17 A. It would depend on --

18 MR. GENTILE: I'm going to object.

19 Excuse me a minute, Ms. Croteau.

20 I'm going to object as vague and
21 ambiguous.

22 Farris, you're using the term "you."

23 Are you talking about her personally or

24 are you talking about an applicant or

25 someone who is signing on?

32

1 MR. AIN: You're correct, my

2 apology.

3 Q. (By Mr. Ain) Let's talk about a
4 loan originator.

5 A. It would depend on --

6 Q. would they be --

7 A. It would depend on the document.

8 Sometimes we do allow them to move forward
9 for a certain period of time, but eventually
10 they would have to acknowledge it.

11 Q. Okay. what's an example of a
12 document that they may not have to accept
13 right then and there and they could move

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14 forward for some time?

15 A. The sexual harassment training that
16 we have out on our website.

17 Q. Is that the only example?

18 A. I think we allow them to bypass one
19 time for our advertising policy, and again it
20 depends at the time what we have out there
21 for them.

22 Q. Okay. What about updates to the
23 mortgage loan originator employment agreement
24 with World Lending Group? When that's
25 updated are they allowed to bypass that, if

33

1 you know?

2 A. It's hooked to our annual renewal
3 compliance, and they have a small window of
4 time. They have like ten days to read it
5 over and acknowledge it. They may have like
6 ten opt outs. I'm not quite sure what it's
7 set on now, but that's kind of what we call
8 it, where they can opt out a few times.

9 Q. By opt out you mean just delay the
10 acknowledgment for a later time?

11 A. That is correct, yes.

12 Q. You do not mean opt out as in not
13 agree to the document and continue to work
14 and be employed.

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15 A. No, thank you for clarifying it.
16 They would just opt out at that particular
17 moment. They would still, the next time they
18 sign on, the agreement would be back on there
19 again for them to acknowledge.

20 Q. Okay. Sandra, do you remember
21 signing a declaration in support of
22 defendant's motion on or about January 16th,
23 that would be your first declaration? Do you
24 remember that?

25 A. Yes, I do.

34

1 Q. Okay. Do you happen to have a copy
2 of it with you?

3 A. Yes, I do.

4 Q. Okay. The attachment to your
5 declaration there is Exhibit A. Do you have
6 that in front of you?

7 A. No, I don't.

8 Q. Take a look at Page 4, what's
9 labeled as Paragraph 15. You testified under
10 oath in this document that the agreement
11 that's attached as Exhibit A, which I
12 understand you don't have with you at this
13 time, is a copy of the agreement stored
14 electronically by GEL under the name of

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15 Dolores Arreguin and executed on April 2nd,
16 2002. Do you remember signing this under
17 oath?

18 A. Yes, I do.

19 Q. Did you get a chance to review that
20 agreement? I know you don't have it with you
21 now, but at the time that you prepared this
22 declaration did you get a chance to review
23 it?

24 A. I'd have to say not fully, no.

25 Q. Okay. Do you know when Dolores

35

1 started working for World Lending Group?

2 A. I believe according to our records
3 her official hire date was July of 2002. I
4 think it was the 19th, but I don't know for
5 sure.

6 Q. Okay. Because we've been trying to
7 reconcile the dates here and I'm hoping you
8 could help us a little bit.

9 I think what may have happened in
10 April of '02 is that Dolores may have started
11 the application process. Is that possible,
12 and maybe that's why this was signed then?

13 MR. GENTILE: Well, I'm going to
14 object as vague, ambiguous, also calls
15 for speculation, and I ask you to

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16 rephrase the question.

17 MR. AIN: Fair enough. I

18 understand, Counsel. Hold on one

19 second. I want to find the name of

20 this.

21 Q. (By Mr. Ain) Sandra, did you work

22 at World Financial Group with Dolores in 2001

23 on?

24 A. I believe Dolores was with WMA

25 Mortgage Services, and that was not under

36

1 World Financial Group.

2 Q. Okay. Did you work with her at any

3 point prior to -- go ahead.

4 A. When I worked for World Marketing

5 Alliance I did not have any field

6 interactions, so I cannot say that I did or

7 did not.

8 MR. MCLEAN: Let him finish his

9 question.

10 Q. When was the first time you met

11 Dolores?

12 MR. GENTILE: When you say met, you

13 mean personally met or talked on the

14 phone or communicated?

15 Q. Generally, communicated with her on

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16 the phone or met her in person or became
17 aware of her.

18 A. I met her at one of our conventions.
19 I really don't remember what year that was.

20 Q. At one of the conventions? Okay.
21 Do you know if Dolores applied for a job with
22 World Lending Group in April of 2002?

23 A. I wasn't here then.

24 MR. GENTILE: I'll object to the
25 extent it calls for speculation.

37

1 Q. Go ahead. You were going to say you
2 weren't with the company?

3 A. I wasn't with the company then.

4 Q. Okay. I'm looking at your
5 declaration right now. If you could please
6 take a look at Paragraph 18 on Page 4. Go
7 ahead and read that to yourself and then when
8 you're ready let me know.

9 A. Okay.

10 Q. Can you explain to me exactly when
11 this would have happened?

12 A. I'm not sure I understand the
13 question.

14 Q. Well, you started with the company
15 in January of '03 and I'm just trying to get
16 a time frame of what it is you knew prior to
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17 January of '03.

18 If Dolores applied for the job
19 somewhere in July of '02 or even maybe April,
20 for all we know, what knowledge do you have
21 about this process that's referenced here in
22 Paragraph 18 presumably prior to January
23 of -- prior to when you started with the
24 company in January of '03?

25 MR. GENTILE: Okay, again I'm not

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1 trying to be difficult here, but I'm
2 going to object as vague and ambiguous
3 in the extreme.

4 The process set forth in Paragraph
5 18 has a number of components to it, and
6 I would ask you, Mr. Ain, to break it
7 down for the witness.

8 MR. MCLEAN: Let me just throw one
9 other thing in there, Mr. Ain, is
10 that --

11 MR. AIN: Yes.

12 MR. MCLEAN: -- Ms. Croteau's
13 testimony, if you'll recall, with regard
14 to the website refers to the uploading
15 in the normal course of business of
16 mortgage loan applications, which is one

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17 of the references in Number 18.

18 So it's not just something that
19 would have preceded January or gone back
20 to April of '02 but something, if I
21 understand her testimony, would be
22 ongoing during the course of her
23 employment with Global Equity Lending.

24 MR. AIN: Fair enough.

25 Q. (By Mr. Ain) And that's kind of the

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1 clarification I'm trying to reach that the
2 process before January of '03, Sandra, to the
3 best of your knowledge, it would have been
4 the same process when you started in January
5 of '03; is that correct?

6 A. I believe it to be, yes.

7 Q. Okay.

8 MR. AIN: Is there a way we can get
9 a copy of the Exhibit A that's attached
10 to the declaration?

11 MR. GENTILE: My understanding is,
12 I'm 99 percent positive that it's the
13 same document that's been Bates stamped
14 as GEL 001 through GEL 006.

15 MR. MCLEAN: I have that document in
16 front of me if you're willing to go on
17 that representation.

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18 MR. GENTILE: I'm sorry?

19 MR. MCLEAN: I have that document in
20 front of me if Mr. Ain is willing to go
21 on that representation.

22 MR. AIN: I will accept that
23 representation. The documents are
24 practically identical with the exception
25 of the Exhibit A stamp on the bottom,

40

1 and they're both dated April of '02 as
2 the print name date of when Dolores
3 Arreguin would have purportedly have
4 reviewed this document and submitted it
5 on the Internet.

6 Q. (By Mr. Ain) Now, Sandra, can you
7 explain to me on Page 6 of this document, how
8 is it that this document would have been
9 reviewed and dated April of 2002?

10 MR. GENTILE: Again, not to be
11 difficult, but object as vague and
12 ambiguous.

13 MR. MCLEAN: And if you know.

14 MR. AIN: Okay.

15 A. I can only tell you of how it would
16 have been starting in 2003, to let you know
17 how.

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18 she could have started the agreement
19 and signed it electronically on line and then
20 the paperwork would have been mailed in
21 later, the paperwork being the I-9 and the
22 w-4, and until we received that she would not
23 have been an official employee but she would
24 be a pending employee waiting for a
25 background confirmation.

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1 Q. Okay. Do you have any knowledge as
2 to when Dolores began the application
3 process?

4 A. Actually, the only record I have is
5 a report that's done through our system that
6 tells us that she electronically signed this
7 document on 4/2, and that's how that date
8 came about.

9 Q. Okay. Now, this document, if we go
10 back to Page 1, it's labeled Global Equity
11 Lending, Inc. Mortgage Loan Originator
12 Employment Agreement.

13 was Global Equity Lending in
14 existence in April of 2002?

15 MR. GENTILE: And, again, I just
16 want to object on the basis of
17 vagueness, ambiguity and also calls for
18 a legal conclusion.

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19 You say in existence, you're talking
20 about legally in existence? De facto in
21 existence? I mean, I just want to make
22 sure the witness understands the
23 question, and it may be very well
24 calling for a legal conclusion.
25 MR. AIN: Okay, that's fair enough.

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1 Q. (By Mr. Ain) Sandra, at the time in
2 April of 2002 who was the employer? Would it
3 have been World Equity Lending or would it
4 have been World Lending Group?

5 A. World Lending Group was the name of
6 the company, when I came in in 2003. And,
7 again, we changed our name to Global Equity
8 Lending.

9 Q. Okay. Now, looking at this document
10 do you know why Global Equity Lending is
11 written there at the top of that page if the
12 company name didn't change until after 2003?

13 A. How we keep our electronic
14 signatures, this was -- obviously it was an
15 error. The Global Equity Lending agreement
16 should have been World Lending Group
17 agreement. This was clearly an error.

18 I thought this was the earliest

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19 version of the document, since I came in at
20 2003, and that's the document that we had
21 sent over.

22 Q. Okay. Okay. Now, this document, is
23 this how it would have been retrieved with
24 Dolores Arreguin's printed name on it and
25 dated 2002?

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1 A. It comes off our system and you
2 merge the two together is how it comes off.

3 Q. Okay. So basically you have a list
4 of agreements that existed from time to time
5 and a list of I guess I accept via the
6 Internet, and based on the date you would
7 compare it to the document that existed at
8 the time and that's how you could tell what
9 they accepted or did not accept, potentially?

10 A. Yes, I think that's a fairly
11 accurate statement.

12 Q. Okay. Sandra, we've been going for
13 about an hour. Did you want to take a break
14 for five minutes or do you want to keep
15 pushing through?

16 A. Is it going to be long?

17 Q. It's up to you. It's just I'm
18 watching the clock and it's not a marathon, I
19 don't want to tire you out.

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20 A. No, I'm fine.

21 MR. GENTILE: I'm sorry, how much
22 time do you have? What's your
23 anticipated length of the depo, Mr. Ain?

24 MR. AIN: I wouldn't be surprised if
25 we're done in another hour. That's why

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1 I want to see if she wants to take a
2 quick break now.

3 THE WITNESS: Oh, yeah, if it's
4 going to be another hour then a quick
5 break would be nice.

6 MR. AIN: Okay, go ahead. Let's
7 take a break for about five minutes.

8 How about when we're all in the
9 picture -- it's 11:05 right now. Once
10 everybody's seated we'll reconvene at
11 11:10 my time.

12 MR. GENTILE: Good enough. Thank
13 you so much.

14 MR. AIN: Okay.

15 (Recess.)

16 Q. (By Mr. Ain) Sandra, I have a few
17 questions for you, and I think I'm going to
18 wrap it up because most of what we're trying
19 to address here occurred prior to when you

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20 started working in January of '03, but let me
21 just ask you a few questions real quick.
22 Looking at the documents that is
23 Bate stamped GEL 021 to 025, have you seen
24 this document before?
25 A. Yes, I have.

45

1 Q. Okay. Turn to Page 25, please, of
2 that document, or what's labeled GEL 025.
3 This document seems to have an
4 actual signature on it as opposed to what we
5 were discussing earlier as, you know, the
6 application process where you click a button
7 and accept on the Internet.
8 Do you know how this document would
9 have been signed or how it was produced to
10 Dolores Arreguin?
11 A. I don't have knowledge of that, no.
12 Q. To the best of your knowledge was
13 there ever a point where the application
14 process was done face-to-face as opposed to
15 via the Internet?
16 A. I'm sorry, I don't know that.
17 Q. Okay. Today are all -- well, from
18 2003 on are all application processes for
19 loan originators completed via the Internet?
20 A. Yes, they are.

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21 Q. Does any of these loan -- do any of
22 these loan originators have an opportunity to
23 discuss with anyone with the company the
24 terms of these agreements?

25 MR. GENTILE: Well, I'm going to

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1 object. Calls for speculation.
2 It also seems to be irrelevant,
3 because from what I understand we agreed
4 that this deposition would be limited to
5 Dolores Arreguin and her consent to the
6 contract or contracts. I think we're
7 going a little far afield here, Mr. Ain.

8 MR. AIN: Well, to the extent that
9 we're trying to understand the process
10 and the policies and procedures that
11 surround the -- you know, the
12 application process here, I'd like to
13 just get an understanding of whether,
14 you know, a loan originator -- and I
15 understand that, you know, Sandra wasn't
16 there prior to '03, but I'm just trying
17 to solicit some testimony regarding the
18 process as she knows it from January '03
19 on, because, you know, if it's changed
20 then, you know, it's relevant to how

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21 Dolores would have -- you know, the
22 plaintiff would have signed and reviewed
23 these documents.
24 Can you kind of allow me some
25 testimony regarding whether a loan

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1 originator employee would have had an
2 opportunity to call Sandra, for example,
3 and ask for some explanation or some
4 help in the application process?

5 MR. GENTILE: I have difficulty with
6 that, because does the witness know how
7 that is accomplished? I think that's
8 one question. Why don't you ask her?

9 MR. AIN: Let's start with that,
10 that's all right. I'll back up a little
11 bit.

12 Q. (By Mr. Ain) Sandra, have you had
13 anybody ever call you, any loan originator
14 ever call you with questions regarding the
15 application process?

16 A. No, I have not.

17 Q. If a loan originator potential
18 applicant or a potential employee has some
19 questions regarding the application process
20 and the signing of these documents, who would
21 they contact?

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22 A. We have a customer support section
23 that answers all questions, and they would
24 contact customer support. That's all out
25 there on our website for them to know what

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1 e-mail to contact and what number to call if
2 they have questions.

3 Q. Did you have to sign a similar
4 agreement that contains an arbitration clause
5 before you became employed in January of '03?

6 MR. GENTILE: I'm going to object.
7 I think it's vague and ambiguous. It's
8 irrelevant.

9 It also invades her right to
10 privacy. I don't see how that has
11 anything to do with the issues here.

12 I mean, the issue here is Dolores
13 Arreguin's intent and the issue of the
14 contract itself. I mean, what this
15 witness did when she signed on with
16 Global Equity Lending has nothing to do
17 with Dolores Arreguin, plus she's not
18 even in the same capacity as Dolores
19 Arreguin.

20 So, frankly I'm going to instruct
21 the witness not to answer the question.

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22 MR. AIN: Okay, that's fine, I
23 understand.
24 Q. (By Mr. Ain) Sandra, do you know
25 who Community Lending is?

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1 A. I've heard of them. I'm not sure
2 who they are.
3 Q. What have you heard about them?
4 A. That they're a mortgage lending
5 company.
6 Q. Do you know if they were ever used
7 in conjunction with preparing loan
8 applications for World Lending Group?
9 A. I wouldn't know that, no.
10 Q. What about Callie Leasing? Are you
11 familiar with that name?
12 A. No, I'm not.
13 Q. Let me turn your attention to Page
14 Number GEL 027.
15 MR. GENTILE: Just so we know we're
16 all on the same page here, no pun
17 intended, this is the employee
18 acknowledgment regarding the World
19 Lending Group Policy Manual. Am I
20 correct, Farris?
21 MR. AIN: Yes, that's correct.
22 MR. GENTILE: Okay.

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23 Q. (By Mr. Ain) Sandra, have you seen
24 this document before?
25 A. Yes, I have.

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1 Q. And when you say yes, are we talking
2 about this specific document that was signed
3 by Dolores or you've seen this document
4 generally?

5 A. Both.

6 Q. Okay. To the best of your knowledge
7 if you look in the middle of this page under
8 the paragraph that starts, "I specifically
9 reviewed the following policies, including
10 any reporting requirements," and then you
11 have nine categories there.

12 Are those boxes supposed to be
13 checked by the potential employee?

14 A. Honestly, I'm not sure. I don't
15 believe so, but I can't say for sure.

16 Q. Okay. Do you know at the time that
17 Ms. Arreguin signed this in 2002, in July of
18 2002, whether there was actually an employee
19 policy manual?

20 A. I wasn't here then so I don't want
21 to speculate.

22 MR. GENTILE: We ask that you do not

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23 speculate, Ms. Croteau.

24 MR. AIN: Fair enough.

25 Q. Is there an employee policy manual

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1 today?

2 A. Yes, there is.

3 MR. GENTILE: Again, I'm going to
4 object. I think that's based on
5 relevancy to specific issues.

6 If you can explain to me how this is
7 relevant to Dolores Arreguin's consent
8 of the contract I'd certainly like to
9 know. Otherwise I'm going to instruct
10 her not to answer the question. This
11 seems to be going into areas that may be
12 relevant if the case proceeds on its
13 merits.

14 MR. AIN: It's relevant to the
15 extent of whether this signature, like
16 other documents the plaintiff has
17 signed, truly acknowledge what the
18 document she signed purports, such as
19 the fact that, as we heard yesterday the
20 plaintiff testify, there was no employee
21 policy manual at the time that she
22 signed this document, and I'm trying to
23 get an understanding of whether today

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24 there is one, if somebody's required to
25 check these boxes and whether they've

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1 read these actual documents or not.

2 MR. GENTILE: Well, what went on
3 today or what goes on today has no
4 relevance as to what went on in April or
5 July of 2002, so I think we're going far
6 afield, Mr. Ain. I just can't see how
7 this is relevant to the issues.

8 And, as you know, the judge did call
9 for -- the judge's clerk did advise us
10 that there's a specific narrow issue
11 that you're supposed to make inquiry to
12 in these depositions.

13 MR. AIN: Okay.

14 Can we go off the record for a quick
15 question?

16 MR. GENTILE: Certainly.

17 (A discussion ensued off the
18 record.)

19 Q. (By Mr. Ain) Sandra, let me turn
20 you to your supplemental declaration that you
21 submitted. Do you have a copy of that with
22 you?

23 MR. MCLEAN: Give me a moment.

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24 MR. AIN: Sure.
25 A. Got it.

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1 MR. AIN: I don't have it anymore.
2 MR. GENTILE: And for the record,
3 that's the one dated February 29th, '08;
4 right?
5 MR. AIN: Give me one minute.
6 MR. GENTILE: Sure.
7 MR. AIN: Give me one second. I
8 seem to have misplaced it myself.
9 MR. GENTILE: Sure.
10 Q. Sandra, take a look at your
11 declaration starting with Paragraph 5 on
12 until Paragraph 9. Can you please review
13 those briefly and let me know when you're
14 ready?
15 A. Okay.
16 Q. Okay. Sandra, starting with
17 Paragraph 6 on Page 2, what knowledge do you
18 have regarding the application process that
19 Dolores went through that you describe here?
20 A. I was using my knowledge of when I
21 came in in 2003 and was going by it wasn't
22 that much different in 2002.
23 Q. Okay. But you don't know
24 specifically whether Dolores went through the
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25 process, clicked on the submit button and

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1 went on to Page 2 as described in this
2 particular paragraph; do you?

3 A. I believe this is the application
4 question page, and that may be in question at
5 that time in 2002. We may not have had that
6 up there.

7 Q. Do you have any specific knowledge
8 of whether Dolores went through this
9 application process that you described in
10 these paragraphs that I had you read, or was
11 that just simply based on what the process
12 was in January of '03?

13 A. Well, what I have is the report
14 showing me that she electronically signed the
15 agreement, which means she would have gone
16 through and clicked off A through D on Page
17 10 of her agreement by the report that I got
18 that she started the sign-up in April of
19 2002.

20 Q. And when you say the agreement,
21 which agreement are you referring to? Is
22 that the one that we were -- that was
23 attached to your Exhibit A of your
24 declaration as what we have now described as

25 GEL 1 through 6? 27533CroteauSandra051308

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1 MR. GENTILE: Or otherwise known as
2 Global Equity Lending, Inc. Mortgage
3 Loan Originator Employment Agreement,
4 correct?

5 A. Could you ask that question again
6 now that I have it in front of me, please?

7 (Whereupon, the record was read by
8 the reporter as requested.)

9 A. As we talked about, that was not the
10 correct agreement. I thought at the time it
11 was, but it was not.

12 Q. Okay. Can I draw your attention to
13 document GEL 21 through 25 again?

14 Sandra, this is the correct
15 agreement for that time frame of when Dolores
16 was applying for a job; do you agree with
17 that?

18 A. Yes.

19 MR. GENTILE: I'm going to just make
20 sure we have -- let's make sure we have
21 a clear record here.

22 when you're talking about the
23 agreement you're talking about the World
24 Lending Group, Inc. Mortgage Loan
25 Originator Employment Agreement Bates

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1 stamped GEL 021 through 025, is that
2 correct, Mr. Ain?

3 MR. AIN: Correct.

4 MR. GENTILE: Okay. I just want to
5 make sure we're all on the same page
6 here.

7 Q. (By Mr. Ain) Sandra, this document
8 was physically signed July 19th, 2002. And I
9 want to ask you now, are you sure that
10 Dolores would have went through the
11 application process on the Internet as you
12 described in your declaration or is it
13 possible that this document was physically
14 provided to her, signed and sent back, as
15 opposed to clicking a submit on the website
16 the way things are today?

17 MR. GENTILE: I'm going to object as
18 vague and ambiguous and ask you to break
19 it down. That's compound. Please.

20 MR. AIN: Okay, fair enough.

21 Q. Sandra, is it possible that Dolores
22 did not check the "I agree" on the website
23 when she was applying for a job and actually
24 was provided with this document to physically
25 sign? If you could answer.

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1 A. I don't believe it could be possible
2 because we wouldn't have been able to
3 register her date and signature if she did
4 not click that "I accept" on line.

5 But obviously I was not there
6 physically to see her do it, so I'm not sure
7 what you're asking me.

8 Q. Do you know whether Dolores was
9 provided with an application packet by an
10 individual of the name of Carl Inlow?

11 A. I have no knowledge of that. I
12 don't know.

13 Q. Okay. Let me take a quick
14 two-minute break and I think I'm done.

15 (Recess.)

16 Q. Sandra, is there anything else that
17 you left out that you know about Delores's
18 application process that she went through
19 back in July of 2002?

20 A. I can't think of anything.

21 MR. GENTILE: Object, vague and
22 ambiguous.

23 Q. Go ahead and answer.

24 A. I can't think of anything.

25 Q. Other than what you've provided in

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1 your two declarations, do you have knowledge
2 of any other circumstances regarding how she
3 would have went through the application
4 process?

5 A. No.

6 MR. AIN: All right. I have no
7 further questions.

8 If we could enter into a stipulation
9 upon my relief of the court reporter of
10 her duties, if we could have the
11 transcript provided to the witness to
12 review.

13 I'll give the witness seven days to
14 review the transcript from when it's
15 received. After that she will advise
16 her attorneys of any changes and I will
17 be advised of those changes by counsel
18 for defendant, Greg Gentile, preferably
19 before June 3rd.

20 Is that okay, Greg? I think we did
21 it with the same date for Dolores.

22 MR. GENTILE: Yeah. That was my
23 understanding. Why don't we just have
24 the same stipulation we entered into
25 yesterday, assuming we can have the

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1 transcript ready and provided to us by
2 May 28th, if it could be e-mailed
3 directly to me and to Mr. McLean, I'm
4 assuming Mr. McLean can send it directly
5 to Ms. Croteau for review and I would
6 assume that Ms. Croteau, it would be --
7 you'd have three days would be
8 sufficient for you to review the
9 transcript and make any changes?

10 THE WITNESS: Yeah, as long -- I'll
11 be back by then, so that will be fine.

12 MR. GENTILE: So that would be what,
13 that would be May 31st? And then if
14 there's any changes you can advise
15 myself and Mr. McLean and you can get
16 that information directly to Mr. Ain.

17 Our supplemental papers need to be
18 filed June 9th, so it should be the same
19 stipulation as we entered into yesterday
20 with respect to Ms. Arreguin's review of
21 the transcript, okay?

22 MR. AIN: Let's do this, go ahead.
23 we'll do the same stipulation as we did
24 yesterday. I only have one question
25 with regard to the original transcript.

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1 I'm not sure how Georgia's laws may
2 differ with regards to the release of
3 that transcript and who it goes to,
4 preferably I'd like to get it.

5 THE COURT REPORTER: Normally the
6 taking attorney will receive the signed
7 -- or not the signed, but the sealed
8 original, and then it's up to you and
9 whatever state rules you have whether
10 it's submitted to the Court or not, but
11 you would receive that as a matter of
12 course.

13 MR. AIN: Okay, excellent. Then
14 I'll receive the original, and other
15 than that we will enter into the same
16 stipulation entered into yesterday in
17 the plaintiff's deposition.

18 MR. GENTILE: That's fine. Close of
19 business of Wednesday, June 4th we'll be
20 advised of any changes made by
21 Ms. Croteau. Okay?

22 MR. AIN: Thank you, Sandra, for
23 your time.

24 (Whereupon, the deposition was
25 concluded at 2:50 p.m.)

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